

**REMARKS**

By the above actions, claims 96, 103, 114, 117, 122 & 134 have been amended. Additionally, claims 101, 108, 115, 116, & 127 have been cancelled. In view of these actions and the following remarks, further consideration of this application is requested.

With regard to the restriction requirement, in view of the reformulating of claim 134 as a claim dependent upon independent claim 114, it is submitted that claim 114 is no longer restrictable relative to the other claims. As such, withdrawal of the restriction requirement and rejoinder of claim 114 is in order and is hereby requested.

Claims 96-102, 105-118, 120, & 122-133 have been rejected under 35 USC § 103 as being unpatentable over the Mantysalo patent application publication when viewed in combination with the Lee patent. At least insofar as the claims have been amended above to state even more explicitly that using the input module from the rear surface is achieved by removing the input module from the coupling bay and reinserting it in oppositely facing front and rear directed orientations, this rejection is inapplicable for the following reasons.

In particular, the subject-matter of claims 96 and 114 are both novel and unobvious over the applied prior art. Mantysalo is directed to a multifunctional UI input device for mobile terminals. As shown, for example, in the embodiment of Figs. 4 – 6 cited by the Examiner, the mobile terminal 400 is a flip-type mobile terminal construction comprising a touch-pad UI input device 404 hinged to the mobile terminal 400 by a hinge 406 in a way that in a closed position the touch-pad UI input device acts as a mechanical protector. If the touch-pad UI input device is opened, it may operate as an input device in laptops or as a “transparent” pointing and input device.

The subject-matter of claim 96 differs from the teaching of Mantysalo in the features of the last two paragraphs of the claim. First, Mantysalo does not teach a coupling bay for receiving an input module. In particular, the touch-pad UI input device is fixedly mounted to a mobile terminal and may not be coupled to or decoupled from the mobile terminal.

Second, the input module according to claims 96 & 114 is movable from a first position accessible at the front face of the computer, after removal of the input module from the coupling bay, to a second position in which it is reinserted into the coupling bay in an

oppositely facing orientation that enables the inputting or manipulating of information at the rear surface of the digital computer housing instead of at the front surface. This feature is also not known from Mantysalo where the touch pad UI input device is fixedly mounted and hinged to the mobile terminal.

Third, as already acknowledged by the Examiner, Mantysalo does not disclose that the input device is also operable for inputting or manipulating of information in a decoupled state disengaged from the housing.

Compared to Mantysalo, the claimed digital computer provides a higher degree of versatility while being mechanically very stable and reliable. Also, the Lee reference would not have prompted the person of ordinary skill to modify the teaching of Mantysalo in such a way that would lead to the claimed subject-matter. That is, Lee discloses a pointing device provided with two types of input means for a computer. As illustrated in Fig. 3, mouse/touch-pad 300 may be separated from the body of a portable computer; however, since its mounting bay 210 is four-sided, having a three side walls and a bottom wall that closes the bay relative to the rear of the computer, the mouse/touch-pad 300 is mountable in the bay in only a single orientation that precludes direct operating access to it at the rear of the computer.

As such, the person of ordinary skill would not have combined the teachings of Mantysalo and Lee because neither Mantysalo nor Lee contain any indication or teaching on regarding use a separable mouse/touchpad as disclosed in Lee in the context of a hingedly mounted touchpad UI input device as in Mantysalo, nor do they teach that an input device connected to a mobile terminal via a hinge may be separated and reconnected in a different orientation way and the same is true relative to mounting in a coupling bay by being insertable in oppositely facing orientations such that inputting or manipulating of information at the rear surface is enabled. Moreover, given that the input device 404 can be swung 360° from the front to the back of the terminal 400 no need would exist to modify the Mantysalo device to enable the input device to be operable at both sides of the terminal 400 while connect it in the manner of Lee would destroy this capability.

Therefore, no logical combination of the teachings of Montysalo and Lee would lead to the claimed subject-matter. As such, the rejection based on Montysalo and Lee should be withdrawn

Claims 103 & 104 have been rejected under 35 USC § 103 as being unpatentable over the Mantysalo patent application publication when viewed in combination with the Lee and Fleming patents. This rejection is also inappropriate at least to the extent it relates to the claims as not presented for the following reasons in addition to those noted above with respect to the basic combination of Mantysalo and Lee.

In particular, Fleming is directed to a laptop similar to that of Lee in that Fleming discloses a removable data input module 200 that is received in mounting bay that is four-sided, having a three side walls and a bottom wall that closes the bay relative to the rear of the computer, the mouse/touch-pad 300 is mountable in the bay in orientations that preclude direct operating access to it at the rear of the computer merely being rotatable in the plane parallel to the bottom wall of the mounting bay so that the buttons 210 can be moved from a position near the forward edge of the computer (as shown at the top of Fig. 3) to an alternate position which places buttons 210 closer to the keyboard and the pointing stick 132 positioned therein (as shown at the bottom of Fig. 3) to facilitate concurrent operation of the pointing stick 132 and the buttons 210 with a single hand. Thus, Fleming suffers the same deficiencies as Lee only more so in that reversibility of the type possessed by Fleming is simply not obtainable with a hinged device as taught by Montyalo. Thus, Fleming is as unable to suggest modification of Montyalo's device in a way that would lead to the presently claimed invention as is Lee.

Thus, a combination of the teachings of Mantysalo, Lee and Fleming would not lead to the claimed subject-matter. As a consequence, this rejection should also be withdrawn and such action is hereby requested.

Claim 121 was rejected under 35 USC § 103 as being unpatentable over the Mantysalo patent application publication when viewed in combination with the Lee patent and Nohr patent application publication. However, even if a coupling bay of the type disclosed by Lee were to be provided with at least one additional interface for connecting further additional equipment with the digital computer rather than the input module, such a bay still would not lead to invention of the independent claims so that this rejection is also requested to be withdrawn.

Therefore, in the absence of new and more relevant prior art being discovered, this application should now be in condition for allowance and action to that effect is requested. However, while it is believed that this application should now be in condition for allowance, in the event that any issues should remain, or any new issues arise, after consideration of this response which could be addressed through discussions with the undersigned, then the Examiner is requested to contact the undersigned by telephone for the purpose of resolving any such issue and thereby facilitating prompt approval of this application.

Respectfully submitted,

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